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April 19, 2004

Ms. Marlene H. Dortch
Secretary of the Commission
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

John Muleta
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

David Solomon
Chief, Enforcement Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Litchfield County Cellular, Inc.*
E911 Interim Report for Tier III Carriers
CC Docket No. 94-102

Dear Ms. Dortch:

Pursuant to the Commission's Order to Stay, in the above referenced docket,¹ Litchfield County Cellular, Inc. ("LCC") hereby submits its E911 Interim Report for Tier III Carriers. This Report provides the Commission with the current status of LCC's E911 efforts and its progress towards compliance with the Commission's E911 Phase II benchmarks.²

¹ *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers, CC Docket 94-102, Order to Stay, FCC 03-241, 18 FCC Rcd 20,987 (2003).*

² LCC respectfully requests waiver of the January 15, 2004 deadline for filing this Interim Report and asks that the Commission accept this report *nunc pro tunc* as of the applicable deadline. The delay in filing this Interim Report was the result of an administrative oversight. As this Report documents, LCC has been channeling its efforts into Phase I implementation.

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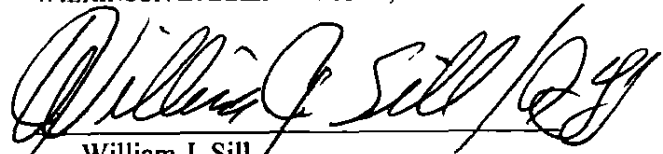
Ms. Marlene H. Dortch
April 19, 2004
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Please do not hesitate to contact the undersigned with any questions that you may have at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By:


William J. Sill
J. Wade Lindsay

Attachment

INTERIM REPORT FOR TIER III CARRIERS

LITCHFIELD COUNTY CELLULAR, INC.

Block B licensee of Kentucky 11-Clay RSA

Litchfield County Cellular, Inc. ("LCC") hereby provides the Commission with its E911 Interim Report ("Report") for Tier III carriers.¹ As a Tier III carrier, LCC is submitting this one-time Report in order to provide the Commission with the current status of its E911 efforts and its progress towards compliance with the Commission's Phase II benchmarks. LCC is the cellular licensee on the Block B portion of the Kentucky 11 - Clay RSA (call sign KNKN787). In preparing the instant Report, LCC has followed the guidelines provided by the Commission in its June 30, 2003 Public Notice.²

LCC understands the importance of E911 and its obligation as a licensee to assist in ensuring that E911 connectivity for Phase I and Phase II service is properly implemented. LCC is using the services of Syniverse Technologies ("Syniverse") (f/k/a Telecommunications Service Incorporated) to assist it with its E911 implementation. Syniverse is a third party vendor with years of experience in assisting wireless carriers, such as LCC, in their E911 implementation efforts by providing both project management and implementation services. Syniverse has played a key role in LCC's E911 implementation process, coordinating the implementation process and assisting LCC with technical problems as they arose. Syniverse, with the participation of the relevant Public Switched Safety Points ("PSAPs") and Local Exchange Carriers ("LECs"), developed an implementation process by which each party was assigned implementation tasks with mutually agreed upon deadlines. To ensure that the parties were all involved and kept current, Syniverse hosts periodic conference calls with all the parties to discuss developments and gauge progress.

The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):

LCC has received three (3) Phase I requests from PSAPs throughout the KY-11 RSA.³ LCC has not received any Phase II requests from any PSAPs within its licensed service area. The three Phase I requests were dated as follows: Whitley County PSAP – August 23, 2002; Kentucky State Police ("KSP") Post #10 covering Bell, Harlan, and

¹ LCC respectfully requests waiver of the January 15, 2004 deadline for filing this Interim Report and asks that the Commission accept this report *nunc pro tunc* as of the applicable deadline. The delay in filing this Interim Report was the result of an administrative oversight. As this Report documents, LCC has been channeling its efforts into Phase I implementation.

² See Public Notice, Wireless Telecommunications Bureau Provides Further Guidance On Interim Report Filings by Small Sized Carriers, DA 03-2113, rel. June 30, 2003.

³ LCC was recently verbally informed by Knox County that it is establishing a new PSAP in Kentucky, and will require LCC to provide Phase I service. Upon receiving a valid written request, LCC will work cooperatively with Knox County to provide Phase I E911 service.

Knox counties – May 5, 2000,⁴ and; KSP Post #13 covering Leslie county – May 5, 2000. The original letter from the KSP, which covered Post #10 and Post #13, was never received by LCC. It appears to have been sent to an incorrect mailing address. On its own initiative, LCC called the KSP to inquire about KSP's E911 needs and at that time learned of the existence of the May 5, 2000 letter. It was not until February 13, 2003 that LCC for the first time received the May 5, 2000 letter.

Prior to LCC being aware of these requests, however, Syniverse and LCC were already working with the PSAPs in LCC's service area to ensure timely and reliable E911 Phase I service. Syniverse and the PSAPs conducted regularly scheduled meetings to discuss implementation milestones and the work that needed to be done to achieve these milestones. Specifically, Syniverse sent out surveys and information requests to the PSAPs and the LECs in order to ascertain the various elements and components of E911 Phase I that LCC would need to implement. This information was deemed essential for LCC to begin implementation efforts and to establish the requisite implementation schedule.

Originally, Syniverse had requested that the PSAPs return their surveys to Syniverse by December 18, 2002. Whitley County, however, did not provide Syniverse with the requisite survey until April 1, 2003. Moreover, Syniverse requested that the PSAPs return their updated Master Street Address Guides ("MSAG") by February 2003. The MSAG is a critical document as it provides information regarding where emergency rescue efforts should be sent. None of the PSAPs met this MSAG deadline. Delays by the PSAPs in returning the requested information have contributed in a significant manner to the delays associated with LCC's ability to provide E911 Phase I service because without this most basic information, such as the number of trunks from the selective router to the PSAP or the location of the ALI database, LCC was unable to proceed with implementation.

Additionally, as previously reported, delays in LCC's ability to respond to the Phase I requests it has received stemmed from the difficulties LCC faced in negotiating interconnection agreements with the LECs serving the counties in the Kentucky 11 RSA. These negotiations have now been finalized and the necessary Trunk Groups have been ordered and installed.

Knox County has decided to set up its own PSAP instead of sharing the PSAP facilities it currently uses with Harlan and Bell Counties. As part of this change by Knox County, the new PSAP personnel have verbally requested Phase I service from LCC but have not put such a request in writing. Knox County is aware of the impact of its decision to establish its own PSAP (and thus change selective routers) on carriers attempting to provide E911 Phase I service. Both Knox County and LCC have agreed to

⁴ The KSP sent one generic request to all carriers on May 5, 2000.

work cooperatively and afford each other the necessary flexibility to meet Knox County's anticipated Phase I request in a mutually acceptable time frame.⁵

Knox county is still negotiating with Bell South and Alltel concerning who will handle the routing of their E911 calls. Currently, KSP 10 receives and forwards Knox county calls. Syniverse has learned that the Knox County PSAP has not completed the turn over in selective routers. It is not yet clear when this migration will take place. LCC will continue to work closely with Knox County on this matter. With regard to KSP 10, 13 and Whitley Counties, LCC has completed E911 Phase I implementation.

The carrier's specific technology choice (i.e., network-based or handset-based solutions, as well as the type of technology used):

As previously reported to the Commission, LCC will be utilizing a handset-based location technology solution for Phase II E911. LCC, however, has not been able to implement this choice because, to the best of LCC's knowledge, ALI-capable TDMA handsets are simply not available to Tier III carriers. Given the impossibility of securing ALI-capable handsets, LCC has decided to undertake a CDMA overlay on its TDMA network.

For a small carrier such as LCC, the purchase and installation of a CDMA overlay is a daunting and capital intensive endeavor. As a result, LCC has had to revise its schedule and now believes that it will begin to roll-out its CDMA overlay in the fourth (4th) quarter of 2004. Because the overlay has taken more time than initially anticipated LCC filed, on April 14, 2004, for a further extension of the FCC's deadlines related to selling ALI-capable handsets.⁶ Specifically, LCC has requested an extension of its September 1, 2003 deadline to begin selling and activating location-capable handsets until October 4, 2004; LCC has requested an extension of its January 31, 2005 deadline to have 25% of all new activated handsets location capable until July 29, 2005; LCC has requested an extension of its May 31, 2005 deadline to have 50% of all new activated handsets location capable until November, 30, 2005; and LCC has requested an extension of its September 30, 2005 deadline to have 100% of all new handsets location capable until March 31, 2006. Finally, LCC has requested an extension of the ultimate December 31, 2005 implementation date for 95% penetration rate for ALI-capable phones until June 30, 2006.

Status on ordering and/or installing necessary network equipment:

As LCC has not received any requests for Phase II E911 service, and thus has not begun to order the network equipment that will be needed to implement Phase II E911 service. As outlined above, LCC is close to successfully implementing Phase I E911 service

⁵ See 47 C.F.R. § 20.18(j)(5); see also, *Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems*, Petition of City of Richardson, Texas, CC Docket No. 94-102, Order on Reconsideration, 17 FCC Rcd 24282, 24282 (2002).

⁶ See *Supplement and Further Petition of Litchfield County Cellular, Inc. for Limited Waiver and Extension of Time of Section 20.18(g) of the Commission's Rules*, filed April 14, 2004.

throughout LCC's service area. Syniverse and LCC will turn to implementation of E911 Phase II service upon completion of Phase I service. LCC will begin working on its Phase II E911 implementation with Syniverse despite there being no E911 Phase II service request from any of the PSAPs covering its area.

If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets:

As noted above, LCC is pursuing a handset-based solution for its system, but requires a waiver of the FCC's deadlines, in order to facilitate this solution. Further, LCC notes that Phase II E911 service has not been requested by the PSAPs in LCC's service area.

The estimated date on which Phase II service will first be available in the carrier's network:

Without a valid PSAP request for E911 Phase II service, LCC cannot estimate when such service will be available. Moreover, E911 Phase II implementation will depend upon LCC's ability to complete the transition to CDMA technology. Should a PSAP request such service in the near future, however, LCC will be able to provide Phase II service only in those areas in which it has completed the CDMA overlay.

Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

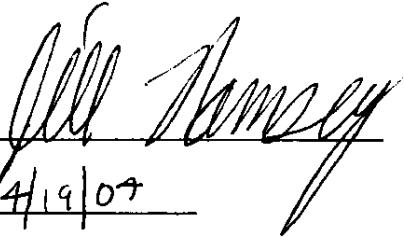
LCC currently does not believe that the 95% penetration rate for ALI-capable phones by the December 31, 2005 deadline is achievable and, therefore, as noted above, has sought an extension of this deadline until June 30, 2006. LCC will provide the Commission with additional updates if any hurdles appear which could endanger its ability to meet the June 30, 2006 deadline.

DECLARATION OF JILL RAMSEY

I, Jill Ramsey, am an officer of Litchfield County Cellular, Inc. d/b/a Ramcell of Kentucky, and I hereby certify that, to the best of my knowledge and belief, the information contained on this form and the attached document is complete and accurate.

Signed: _____

Date: _____


4/19/07